

palladium, platinum, cobalt or the like), metal oxide, alloy or a multilayer composite derived from the aforementioned metal and/or metal oxide, e.g., aluminum zinc oxide, galinium indium oxide, tin oxide or fluorine-doped indium oxide.

Merely a list of possible materials for the conductive layer are provided, which list among many options includes galinium indium oxide and fluorine doped indium oxide. However, nowhere does Liu disclose or even remotely suggest that the conductive layer contains indium oxide as its major component and further one or two or more oxides selected from tungsten oxide, molybdenum oxide and niobium oxide. No single ingredient is highlighted as being a possible major component and no choices for further oxides are provided by Liu.

Moreover, the choices provided in the list include many metals, which are not in the oxide phase, as required by the present claims.

Additionally, no examples of Liu mention indium oxide or even any of the additional oxides selected from tungsten oxide, molybdenum oxide and niobium oxide.

As such, Lui does not disclose a layer with sufficient specificity to render applicants' invention obvious. Nothing in Liu would lead one of ordinary skill in the art to a transparent conductive layer which is disposed on a transparent substrate and contains indium oxide as its major component and further one or two or more oxides selected from tungsten oxide, molybdenum oxide and niobium oxide.

Kim does not overcome the deficiencies of Liu, and for this reason at least, all the rejected claims over the combination of Liu and Kim should be withdrawn.

Additionally, regarding claims 7 and 8, Kim does not teach the components of the etchant. Neither an etchant containing oxalic acid, which forms the transparent conductive layer, nor a mixture acid containing phosphoric acid, acetic acid and nitric acid, which forms the metal reflecting layer, are described by Kim.

Reconsideration is respectfully requested.

### **The Second Claim Rejection Under 35 USC § 103**

Claims 10, 12-14 and 16-21 are rejected as allegedly unpatentable over Tsuda in view of Kim.

The Office Action appears to intermingle various elements of Tsuda and treat the teachings related thereto as teachings toward a single element of the presently claimed

invention. The Office Action first points to element 34 in Tsuda and then to element 22 and their components/ingredients are alleged to render obvious the transparent conductive layer of the present claims. Simply there is no reasonableness to such a random picking of various ingredients of two distinct elements of Tsuda in making allegations about the obviousness of the single element of the present claims, i.e., of the transparent conductive layer.

Element 34 in Tsuda is the "pixel electrode." See column 15, line 4. It is a distinct element from element 22, which is a "first metal film." See column 14, line 55. The pixel electrode may be Indium Tin Oxide. No further ingredients are taught or suggested for this component/element. The first metal film is disclosed to be "tantalum or a tantalum alloy" or "a tantalum or tantalum alloy being main ingredients" in combination with additional ingredients, e.g., tungsten. Nothing in Tsuda teaches or even remotely lends itself to the interpretation that the first metal film should or even could be made of anything other than "tantalum or a tantalum alloy" or "a tantalum or tantalum alloy being main ingredients."

As such, Tsuda does not teach or suggest a transparent conductive layer which is disposed on said transparent substrate and contains indium oxide as its major component and further one or two or more oxides selected from tungsten oxide, molybdenum oxide and niobium oxide.

As in the rejection above, Kim does not overcome the deficiencies of Tsuda, and for this reason at least, all the rejected claims over the combination of Tsuda and Kim should be withdrawn.

Additionally, again as in the rejection above, regarding claim 18, Kim does not teach the components of the etchant. Neither an etchant containing oxalic acid, nor a mixture acid containing phosphoric acid, acetic acid and nitric acid are described by Kim.

Reconsideration is respectfully requested.

The Commissioner is hereby authorized to charge any fees associated with this response or credit any overpayment to Deposit Account No. 13-3402.

Respectfully submitted,

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